

REMARKS

The examiner is thanked for the performance of a thorough search.

Claims 1, 17, 22, 24-28, and 30-32 have been amended. No claims have been canceled or added. Hence, Claims 1-28 and 30-33 are pending in the application.

Each issue raised in the Final Office Action mailed May 31, 2005 is addressed hereinafter.

I. SUMMARY OF TELEPHONE INTERVIEW

A Telephone Interview was held in the present application on August 29, 2005 between the Examiner Mr. Quang Nguyen and the Applicants' representative Mr. Christopher J. Palermo. During the interview, Claim 1 was discussed in view of Malik et al., U.S. Pat. No. 5,832,503 ("MALIK"). A general agreement was reached that if Claim 1 were amended to exclude a one-to-one mapping of a symbolic reference to a value, Claim 1 would overcome the combination of MALIK and other references over which Claim 1 was rejected in the Final Office Action.

Claim 1 and the other independent claims of the present application have been amended herein in accordance with the agreement reached during the Telephone Interview. Entry of these amendments is herein respectfully solicited, and it is respectfully submitted that all claims of the present application are in condition for allowance.

II. ISSUES RELATING TO THE CITED ART

A. INDEPENDENT CLAIM 1

Claim 1 has been rejected as allegedly unpatentable under 35 U.S.C. § 103(a) over Chen et al., U.S. Pat. No. 6,195,694 ("CHEN") in view of Royal, Jr. et al., U.S. Pat. No. 6,571,201 ("ROYAL"), and further in view of MALIK.

Among other features, Claim 1 recites:

...

retrieving a template describing a device configuration, wherein **the template comprises symbolic references to one of a plurality of values of one or more parameters** that may receive values specific to a particular device; **wherein each symbolic reference identifies an operation and a list of parameters for that operation;**

It is respectfully submitted that CHEN, ROYAL, and MALIK do not disclose the above features of Claim 1. In particular, contrary to the assertion in the Final Office Action, MALIK does not disclose a template comprising symbolic references that can be substituted by, or instantiated with, one of a plurality of values of one or more parameters that may receive values specific to a particular device. Further, CHEN, ROYAL, and MALIK, whether taken alone or in combination, do not describe the feature of Claim 1 of a symbolic reference that identifies an operation and a list of parameters for that operation.

1. CHEM, ROYAL, and MALIK do not describe the feature of Claim 1 of a template comprising symbolic references to one of a plurality of values of one or more parameters.

The Final Office Action asserts that this feature of Claim 1 is described in MALIK. This is incorrect.

MALIK describes a method for monitoring parameters that govern operational characteristics of a network. A database of models is provided, each model representing an associated network device and including attribute values associated with the device. Templates are used to filter a model in order to retrieve values for each of the attributes and create a configuration record. (Abstract.) Specifically, “a template is a list of attributes for a device of certain model type.” (Col. 3, lines 27-28.) The user is provided with a list of attributes for a model type, and the user selects which attributes are listed in the template. (Col. 3, lines 28-33.) A configuration manager then binds a value for each of the attributes listed in the template by retrieving the values from the database of models. (Col. 3, lines 36-38.) “The template functions

like a filter, blocking out unwanted attributes (IP address for example) and **capturing the values of those attributes found in the template.**" (Col. 3, lines 38-41; emphasis added.)

A configuration is a "record of all attribute/value pairs which are obtained by interrogating the selected models through the template." (Col. 3, lines 61-63.) The difference between a template and a configuration is illustrated in FIG. 3. (Col. 3, lines 48-49.) In FIG. 3, item 40 is a template that lists the names of attributes, while item 42 is a configuration that includes a list of attributes on the left and corresponding values on the right. (Col. 3, lines 49-53.) Thus, MALIK clearly lacks the concept of associating an attribute in the template 40 with one of a plurality of values for that attribute for the simple reason that an attribute in a particular configuration can be associated with only one value. Further, in MALIK the retrieved templates are merely lists of attributes and single values; parameter substitution does not occur.

In contrast, Claim 1 recites the feature of a template comprising symbolic references which may be substituted, or instantiated, with one of a plurality of values of one or more parameters that may receive values specific to a particular device. Further, the Office Action does not assert, and the Applicants do not consider, that CHEN or ROYAL describe this feature of Claim 1. Thus, since MALIK does not describe this feature, any combination of CHEN and ROYAL with MALIK necessarily fails to describe the above feature of Claim 1.

2. CHEN, ROYAL, and MALIK do not describe the feature of Claim 1 of each symbolic reference identifying an operation and a list of parameters for that operation.

The templates described in MALIK, such as template 40 in FIG. 3, include a list with the names of the attributes associated with a device of a certain model type. These attribute names identify certain parameters associated with the model type. In a configuration record instantiated from such a template, the attribute names are merely associated with a value and do not identify

an operation and a list of parameters as featured in Claim 1. Specifically, as can be seen in configuration 42 in FIG. 3 of MALIK, **an attribute name and the value of that attribute** form an **attribute/value pair**, which MALIK defines as a “configuration record”. (See MALIK, col. 3, lines 61-63.) Thus, MALIK does not describe or suggest that an attribute name, or any other element of the MALIK template, is a symbolic reference that identifies an operation and a list of parameters for that operation.

For this reason, it is respectfully submitted that MALIK does not describe the feature of Claim 1 of a template comprising symbolic references, where each symbolic reference identifies an operation and a list of parameters for that operation. Further, since neither CHEN nor ROYAL describes any templates, any combination of CHEN and ROYAL with MALIK necessarily fails to teach the above feature of Claim 1.

Since CHEN, ROYAL, and MALIK, whether taken alone or in combination, do not describe, teach, or suggest all features of Claim 1, Claim 1 is patentable under 35 U.S.C. §103(a) over CHEN in view of ROYAL, and further in view of MALIK. Reconsideration and withdrawal of the rejection of Claim 1 is respectfully requested.

B. INDEPENDENT CLAIMS 17, 24, 26-28, 30 AND 32

Independent Claims 17, 24, 26-28, and 30 have been rejected as allegedly unpatentable under 35 U.S.C. § 103(a) over CHEN in view of ROYAL, and further in view of MALIK. Independent Claim 32 has been rejected as allegedly unpatentable under 35 U.S.C. §103(a) over Pan et al., U.S. Pat. No. 6,775,701 (“PAN”) in view of MALIK.

Claims 17, 24, 26-28, 30 and 32 include features similar to the features of Claim 1 discussed above. Further, in rejecting Claim 32, the Office Action relies explicitly on MALIK, and not on PAN, to support prior disclosure of the features discussed above with respect to Claim 1. For this reason, it is respectfully submitted that Claims 17, 24, 26-28, 30 and 32 are

patentable under 35 U.S.C. § 103(a) for at least the reasons given above with respect to Claim 1. Reconsideration and withdrawal of the rejections of Claims 17, 24, 26-28, 30, and 32 are respectfully requested.

C. DEPENDENT CLAIM 6

Claim 6 has been rejected as allegedly unpatentable under 35 U.S.C. § 103(a) over CHEN in view of ROYAL, further in view of MALIK, and further in view of Suarez, U.S. Pat. No. 5,790,789 (“SUAREZ”).

Claim 6 depends from independent Claim 1, and thus incorporates all features of Claim 1. For this reason, Claim 6 is patentable for at least the reasons given above with respect to Claim 1.

1. In addition, Claim 6 recites features that independently render it patentable.

For example, Claim 6 recites:

A method as recited in Claim 1, further comprising the steps of:
providing the device-specific instance of configuration information to a plurality of network devices;
at one of the network devices, syntax checking only configuration commands of the device-specific instance of configuration information to determine whether the configuration commands therein conform to a command language that is understood by the network device;
upon successful syntax checking, generating an event to an event service to which the plurality of network devices subscribe, wherein the event announces that the configuration commands conform to correct syntax;
in response to receiving the event, applying the device-specific instance of configuration information to the network devices concurrently.

Thus, Claim 6 essentially describes a method in which (1) a device-specific instance configuration information is provided to a plurality of devices; (2) the configuration commands in the information are syntax checked at one device; (3) in response to the successful syntax checking of the commands, an event is generated that announces that syntax checking is complete; and (4) in response to receiving the event, the device-specific instance of the configuration information is applied to the plurality of network devices concurrently.

It is respectfully submitted that CHEN, ROYAL, MALIK, and SUAREZ, whether taken alone or in combination, do not describe or suggest the combination of these features of Claim 6. In particular, the Office Action does NOT state, and the Applicants cannot find, that any of the cited references teaches applying the same configuration information to a plurality of devices concurrently.

Further, since none of the references teaches that the same configuration information may be applied to MULTIPLE devices, there is no suggestion or motivation to combine the references in order to obtain the combination of features recited in Claim 6.

In contrast, Claim 6 recites that the same device-specific instance of configuration information is provided to a plurality of devices; the configuration commands are syntax checked at ONE device; and if the syntax check is successful, then an event is generated and in response to the receiving of the event, the device-specific instance of configuration information is applied to the PLURALITY of devices concurrently.

Since CHEN, ROYAL, MALIK, and SUAREZ, whether taken alone or in combination, do not describe, teach, or suggest, the combination of features recited in Claim 6, it is respectfully submitted that Claim 6 is patentable under 35 U.S.C. §103(a) over CHEN in view of ROYAL, further in view of MALIK, and further in view of SUAREZ. Reconsideration and withdrawal of the rejection of Claim 6 is respectfully requested.

D. DEPENDENT CLAIMS 2-16, 18-23, 25, 31 AND 33

Claims 2-3, 8-14, 18-23, 25 and 31 have been rejected as allegedly unpatentable under 35 U.S.C. §103(a) over CHEN in view of ROYAL, and further in view of MALIK. Claims 4-5 have been rejected as allegedly unpatentable under 35 U.S.C. §103(a) over CHEN in view of ROYAL, further in view of MALIK, and further in view of Mattox, U.S. Pat. No. 5,404,321 ("MATTOX"). Claims 6-7 and 15-16 have been rejected as allegedly unpatentable under 35

U.S.C. §103(a) over CHEN in view of ROYAL, further in view of MALIK, and further in view of SUAREZ. Claim 33 has been rejected as allegedly unpatentable under 35 U.S.C. §103(a) over PAN in view of MALIK.

Claims 2-16, 18-23, 25, 31 and 33 are dependent upon one of independent Claims 1, 17, 24, 30, and 32, and thus include each and every feature of the corresponding independent claim. Furthermore, in rejecting Claims 4-5, 6-7, 15-16, and 33 the Office Action relies explicitly on MALIK, and not on MATTOX, SUAREZ, or PAN, to support prior disclosure of the features discussed above with respect to Claim 1. Thus, each of claims 2-16, 18-23, 25, 31 and 33 is allowable for the reasons given above for Claim 1. In addition, each of Claims 2-16, 18-23, 25, 31 and 33 introduces one or more additional features that independently render it patentable. However, due to the fundamental differences already identified, to expedite the positive resolution of this case a separate discussion of those features is not included at this time. Therefore, it is respectfully submitted that Claims 2-16, 18-23, 25, 31 and 33 are allowable for the reasons given above with respect to Claim 1.

III. CONCLUSION

The Applicants believe that all issues raised in the Office Action have been addressed. Further, for the reasons set forth above, the Applicants respectfully submit that allowance of the pending claims is appropriate. Entry of the amendments to the claims and reconsideration of the present application is respectfully requested in light of the remarks herein.

The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

A petition for extension of time, to the extent necessary to make this reply timely filed, is hereby made. If applicable, a law firms check for the petition for extension of time fee is enclosed herewith. If any applicable fee is missing or insufficient, throughout the pendency of

this application, the Commissioner is hereby authorized to charge any applicable fees and to credit any overpayments to our Deposit Account No. 50-1302.

Respectfully submitted,

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